



EXHIBIT A

Proposed Schedule for Further Proceedings Chronologically

CARRIER AND USG CASES ONLY

<u>DATE</u>	<u>CASE</u>	<u>EVENT</u>
March 29	USG CASES	<u>CCR</u> – <i>USG Supplemental Brief on Impact of FISC Orders</i>
April 20	USG CASES	<u>CCR</u> – <i>Plaintiffs' Supplemental Brief In Reply to USG Supplemental Brief on FISC Orders and in Further Support of Plaintiffs' Pending Motion for Summary Judgment and Opposition to Defendants' Motion to Dismiss or for Summary Judgment</i>
May 4	CARRIER CASES	<u>Verizon & Bell South</u> <i>USG State Secrets Privilege MTD/MSJ</i>
May 11	USG CASES	<u>CCR</u> – <i>USG Reply to Plaintiffs' Supplemental Brief</i>
May 18	CARRIER CASES	<u>Verizon & Bell South</u> <i>Carriers' MTD/MSJs</i>
May 25	USG CASES	<u>Shubert</u> - <i>USG State Secrets Privilege MTD/MSJ</i>
June 8	USG CASES	<i>Hearing on <u>CCR</u> Case Pending Motions (Plaintiffs' Motion for Summary Judgment; United States Motion to Dismiss);</i>
July 20	CARRIER CASES	<u>Verizon & Bell South</u> <i>Plaintiffs' Opposition to USG and Carrier Motions to Dismiss</i>

July 27	USG CASES	<i><u>Shubert</u> - Plaintiffs' Opposition to USG State Secrets Privilege Motion</i>
August 24	CARRIER CASES	<i><u>Verizon & Bell South</u> – USG and Carrier Replies to Plaintiffs' Opposition.</i>
August 31	USG CASES	<i><u>Shubert</u> – USG Reply to Plaintiffs' Opposition</i>
September 7	CARRIER CASES	<i><u>Verizon & Bell South</u> – Hearing on Motions</i>
September 14	USG CASES	<i>Hearing on Shubert Case</i>

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 1 Attachment, 10.2 KB 

Dear Counsel

Attached is a proposed schedule for further MDL proceedings in the Carrier and Government cases only. The schedule does not include dates for any other activities that may need to be added. For example, the Government is separately discussing a schedule with the State PUC Defendants for briefing those cases. In addition, nothing is scheduled in Hepting (and the non-Hepting AT&T cases) unless and until the court rules on discovery and permits further proceedings. Also, the Court has not yet ruled on whether Al-Haramain will proceed. Thus, this schedule is based on what we believe will proceed at this time and is subject to change to accomodate additional events.